

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re HERALD, PRIMEO AND THEMA
FUNDS SECURITIES LITIGATION

This Document Relates To:

ALL ACTIONS.

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Civil Action No. 09 Civ. 0289 (RMB)

NOTICE OF MOTION TO ADMIT COUNSEL, KEITH F. PARK, *PRO HAC VICE*

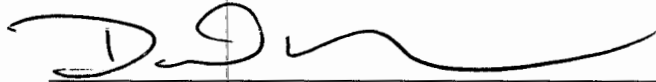
FILED
U.S. DISTRICT COURT
2011 JUN 30 PM 3:14
S.D. OF N.Y.

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that upon the annexed Declaration of David A. Rosenfeld in support of this motion and the Certificates of Good Standing annexed hereto, we will move this Court before the Honorable Richard M. Berman at the United States Courthouse for the Southern District of New York, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an order allowing the admission of Keith F. Park, a member of the law firm of Robbins Geller Rudman & Dowd LLP, 655 West Broadway, Suite 1900, San Diego, California 92101, 619/231-1058 and a member in good standing of the bars of the State of California and New York, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel. There are no pending disciplinary proceedings against this applicant in any state or federal court.

DATED: June 30, 2011

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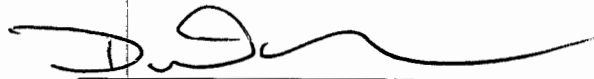
CERTIFICATE OF SERVICE

I, David A. Rosenfeld, hereby certify that on June 30th, 2011, I caused a true and correct copy of the attached:

Notice of Motion to Admit Counsel, Keith F. Park, *Pro Hac Vice*; and

Declaration of David A. Rosenfeld in Support of Motion to Admit Counsel, Keith F. Park, *Pro Hac Vice*

to be served by first-class mail to all counsel on the attached service list.

A handwritten signature in black ink, appearing to read 'D. Rosenfeld', with a long horizontal flourish extending to the right.

David A. Rosenfeld

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State of New York
Supreme Court, Appellate Division
Third Judicial Department

*I, Robert D. Mayberger, Clerk of the Appellate Division of the
Supreme Court of the State of New York, Third Judicial Department, do
hereby certify that*

Keith Farmer Park

*having taken and subscribed the Constitutional Oath of Office as prescribed by
law, was duly licensed and admitted to practice by this Court as an Attorney
and Counselor at Law in all courts of the State of New York on the 8th day of
March, 1983, is currently in good standing and is registered with the
Administrative Office of the Courts as required by section four hundred sixty-
eight-a of the Judiciary Law.*

*In Witness Whereof, I have hereunto set my hand
and affixed the Seal of said Court, at the
City of Albany, this 24th day of June,
2011.*



Robert D Mayberger
Clerk



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

June 28, 2011

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, KEITH F. PARK, #054275 was admitted to the practice of law in this state by the Supreme Court of California on December 14, 1972; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert
Custodian of Membership Records

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re HERALD, PRIMEO AND THEMA	:	Civil Action No. 09 Civ. 0289 (RMB)
FUNDS SECURITIES LITIGATION	:	
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This Document Relates To:	:	
	:	
ALL ACTIONS.	:	
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DECLARATION OF DAVID A. ROSENFELD IN SUPPORT OF MOTION TO ADMIT
COUNSEL, KEITH F. PARK, *PRO HAC VICE*

DAVID A. ROSENFELD, declares, under penalty of perjury:

1. I am a member of Robbins Geller Rudman & Dowd LLP, counsel for Lead Plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Lead Plaintiff's motion to admit Keith F. Park as counsel *pro hac vice* to represent Lead Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1999. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Keith F. Park since 2004.

4. Keith F. Park is a partner of Robbins Geller Rudman & Dowd LLP, in San Diego, California.

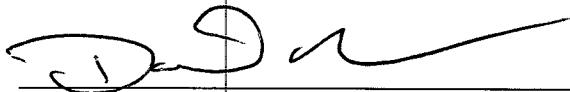
5. I have found Mr. Park to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of Keith F. Park, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Keith F. Park, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Keith F. Park, *pro hac vice*, to represent Lead Plaintiff in the above-captioned matter, be granted.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 30th day of June, 2011, at Melville, New York.

A handwritten signature in black ink, appearing to read 'D. Rosenfeld', is written over a horizontal line.

DAVID A. ROSENFELD

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re HERALD, PRIMEO AND THEMA	:	Civil Action No. 09 Civ. 0289 (RMB)
FUNDS SECURITIES LITIGATION	:	
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This Document Relates To:	:	
	:	
ALL ACTIONS.	:	
_____	:	

ORDER FOR ADMISSION *PRO HAC VICE*

IT IS HEREBY ORDERED that Keith F. Park of Robbins Geller Rudman & Dowd LLP, 655 West Broadway, Suite 1900, San Diego, California, telephone number 619/231-1058, fax number 619/231-7423, email address keithp@rgrdlaw.com, is hereby admitted to practice *pro hac vice* as counsel for Lead Plaintiff in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

DATED: _____

THE HONORABLE RICHARD M. BERMAN
UNITED STATES DISTRICT JUDGE